UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MA 02203-2211

MEMORANDUM

DATE: August 20, 1990

SUBJ: Health Assessment for Iron Horse Park

as amended April 4, 1990

FROM: Don McElroy, RPM - Iron Horse Park Www

CT Superfund Section (HEC-CAN6)

TO: Louise House, ATSDR (EER-LEX)

I have enclosed a number of concerns which I have, regarding statements contained in the ATSDR Health Assessment for Iron Horse Park as amended April 4, 1990. I would ask that you consider these concerns in a further amendment of the Health Assessment.

If you have problems or disagreements with any of these items, please contact me at 223-5518.

MEMORANDUM

TO:

Margaret Leshen, EPA, Chief CT Superfund Section

FROM:

Andrea Sewall, CDM

PROJECT:

Iron Horse Park Superfund Site, Billerica, Massachusetts

SUBJECT:

Review of ATSDR Health Assessment for Iron Horse Park

DATE:

July 9, 1990

As requested, CDM has reviewed the April 1990 amended Health Assessment for the Iron Horse Park site prepared by the Agency for Toxic Substances and Disease Registry (ATSDR). This document was reviewed for technical accuracy (i.e., correct identification of contamination), and to determine if the recommendations will be covered under on-going or future work. In general, the amended document contains a number of inaccurate and misleading statements. To a large extent, the document also ignores the groundwater information provided by the Phase 1B Remedial Investigation (B&M Lagoon Area) Report (May, 1988), and the Phase 1C Remedial Investigation (Shaffer Landfill) (November, 1989). Specific comments are addressed below.

I. SUMMARY

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- (5) Comment: Page 1, para. 2: "Based on the results of these studies further testing of offsite groundwaters for the presence of organic chemicals and cyanide may be necessary."
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- (6) Comment: Page 1, para. 2: "A six-fold increase in the lung cancer mortality rate was observed in men aged 18-64 who lived within a one-mile radius of the site."
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- (7) Comment: Page 1, para. 2: "Based on this information, ATSDR has concluded that the site is of public health concern and requires further follow-up study.
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III. ENVIRONMENTAL CONTAMINATION

(1) Comment: Page 4, para. 2: "Benzo(a)pyrene (35,000 ppb) was also found in soil beneath the sludge pilings as far down as five feet below surface level."

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V. DATA NEEDS AND EVALUATION

(1) Comment: Page 9, para. 2: "No soil contamination data was gathered from Shaffer Landfill. Such monitoring is indicated because of the extensive ground and surface water contamination in the area."

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- (1) Comment: Page 18, para. 1: "ATSDR has concluded that this site is of public health concern...human exposure to asbestos may have occurred... soil lead levels that were detected near the B&M locomotive garage also constitute a health concern."
 - Response: Followup studies at the Iron Horse Park site will address the integrity of the cap over the asbestos landfill, as well as lead contaminated soils near the garage.
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 - Response: As discussed, soil monitoring in the Shaffer Landfill would serve to disturb the cap and therefore it is not an activity that will be performed as part of future work at the site. However, the B&M landfill and the RSI landfill will be characterized as part of future work.

AS/sb

cc: R. Christian D. McElroy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

January 20, 1989

Marilyn DiSirio Agency for Toxic Substances and Disease Registry United States Public Health Service 90 Canal Street Boston, MA 02203

Dear Ms. DiSirio:

Attached are EPA's comments on the draft Health Assessment for the Iron Horse Park Superfund Site in Billerica, Massachusetts.

EPA believes that the report overstates the risk that the Site may pose to human health. EPA recommends that the report be revised to more accurately represent the potential health concerns. The Agency further recommends that you utilize the recently completed investigates of the B&M Lagoons, Shaffer Landfill and other portions of the Site. Also, please feel free to discuss the Site with EPA personnel and EPA's contractors who are familiar with it.

If you have any questions on this, please call me at 573-9633.

Sincerely,

John Gallagher

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EPA COMMENTS ON THE ATSDR HEALTH ASSESSMENT FOR IRON HORSE PARK

- 1. Throughout the report, contamination is presented as a threat to human health although the concentrations measured are, in many cases, close to the analytical detection limits or below health-based standards. When data is presented, it should be accompanied with an explanation and compared to applicable or relevant and appropriate health-based standards.
- 2. Arsenic, identified as a contaminant, may in fact be a naturally occurring constituent found in the area.
- 3. EPA completed a thorough risk assessment on the B&M Lagoons in support of the 1988 Record of Decision for the lagoon cleanup. Although this assessment is not mentioned, it concluded that under the present use of the Site (i.e., as an industrial area), the lagoons do not pose a significant risk to human health. This contradicts your conclusions.
- 4. EPA completed a Wetlands Characterization and Biological Investigation of Iron Horse Park in December 1988. It found that biota in and around Iron Horse Park are diverse and in good health; however, elevated levels of four pesticides and PCBs were observed in fish tissue analysis. Elevated levels of VOCs and other organic compounds were not observed. There is little evidence that contamination from Iron Horse Park is creating an endangerment via the food chain.
- 5. The elevated lead found in the B&M garage area may pose a health threat to on-site workers. However, lead migrating off-site on workers clothing and causing a health threat is very improbable.
- 6. EPA's recent evaluation of the Shaffer Landfill has shown that the landfill contributes contaminated leachate to the Richardson Pond; however, the PAHs observed were probably due to combustion sources in the area (e.g., cars, locomotives) and are not from the landfill. Additionally, EPA concluded that there is not a hydrologic connection between the Shaffer Landfill and the Tewksbury municipal wells.
- The salt pile is covered.
- 8. TCE found in the Wood Fabricators catch basin at a concentration of 280 ppb, would be attenuated to much lower concentrations as it was transported off-site and would not pose an off-site health threat.

- 9. Ground water in and around the Site has been sampled and analyzed. Although some contamination has been found, EPA has no evidence to conclude that this is presently causing an endangerment to human health. Residents in the area are on a municipal water supply and, as discussed, the Tewksbury well field is not hydrologically connected to the Site.
- 10. EPA concurs with the recommendation to study the probable causes of the higher lung cancer incidence in area around Iron Horse Park. However, until all possible factors are investigated (e.g., smoking and occupations), singling out Iron Horse Park as the probable cause of the increased incidence of cancer is premature.
- 11. PCB contaminated soil and sediments were removed from the Manville catch basins and at the outlet to the Middlesex Canal in 1986.



Michael S. Dukakis Governor

Philip W. Johnston Secretary

Deborah Prothrow-Stith, M.D. Commissioner

The Commonwealth of Massachusetts Executive Office of Human Services Department of Public Health

150 Tremont Street Boston 02111 (617) 727-2700

December, 8, 1988

Ms. Linda Murphy EPA Region, HSL-CAN 3 John F. Kennedy Building Boston, Mass.

Dear Ms. Murphy,

On Tuesday, December 6, 1988, three copies of the draft Health Assessment for Iron Horse Park were hand delivered to you. After re-reading the draft, I discovered two errors in the text and made the appropriate corrections. Kindly substitute the enclosed pages in each of the three drafts for those currently in the Health Assessment copies. I am sorry for this inconvenience and thank you for your attention.

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William C. Strohsnitter Environmental Analyst, Division of Environmental

and Toxicology

WCS:slw

CC: Stephen D. Von Allmen, ATSDR
Juan Reyes, ATSDR
Marilyn Disirio, ATSDR
Suzanne Condon, MDPH
Eileen Furlong, MDPH

b). Off-site and drinking water contamination.

Two monitoring wells were drilled near the IHP boundary, upgradient of the B & M waste water lagoons and no significant contamination was detected. Ninety-five percent of the town of Billerica recieves its drinking water from a pumping station on the Concord River, one mile upstream of its junction with the Middlesex Canal and there is no indication of potential for contamination from IHP. Four private wells in the area were previously removed from service due to excessive iron and manganese. The presence of methylene chloride in one of these wells would be a concern if it were substantiated. Reports of this detection, however, are ambivalent and it is uncertain whether methylene chloride was actually detected in the well or if the value is the result of a laboratory contamination. The presence of trace amounts of 1,1,1 trichloroethane and 1,1,2,2 tetrachloroethane in the Tewksbury drinking water supply wells was not fully investigated in the Remedial Investigation. It is possible that the presence of these compounds could have resulted from the reduction of TCE and tetrachloroethylene respectively. It may also be possible that these compounds originated from the IHP site. In addition, the possibility exists for the contaminants found in Richardson Pond to infiltrate these wells. Levels of benzene and arsenic detected in the pond exceed those allowable by Massachusetts Drinking Water Standards. Regular ingestion of these contaminants, at levels detected in the pond, has, in numerous animal studies, been associated with increased cancer risk.

(3). Soil

Benzo(a) pyrene and other suspected human carcinogens in the PAH family were found at high concentrations in soil near the catch basins at the J-M facility. This poses a long-term health concern to those who work in proximity to where these contaminants were detected. PCB's were also found in soil and sediment of the Middlesex Canal near the J-M catch basin. These contaminated soil particles could migrate if the media which contained the PCBs were disturbed. The concern here lies with the bioaccumulation potential of these compounds in fish and wildlife and subsequent human exposure if contaminated food is consumed.

PAH's in the sludge pilings near the B & M lagoons are of concern as they have infiltrated the soil layer. Asbestos and PAH's were found in the soil of B & M scrap yard. This area was not fully characterized in the Remedial Investigation. Clutch plates and brake pads which may have been disposed of at the site, both contain asbestos. Access to the scrap yard is not restricted and airborne asbestos could be generated if these scrapyard remants are disturbed. Ingestion of soil at this location could be of concern due to the presence of PAH's. Lead was found in the scrap yard soil in high amounts, which if inhaled or ingested, poses a health risk. This is plausible as it lies on the periphery of the site and is possibly accessible to children playing near the area.

The lead levels found in the soil near the B & M garage also pose a health risk as the levels detected were in excess of levels considered safe. Disturbed soil in the area could put workers at the site at increased risk of exposure through inhalation. This exposure could result in increased risk of central and peripheral neurological disorders. Abnormalities in hemoglobin formation could also result. Ingestion of these soils is likely if workers in the area exhibit frequent hand to

mouth contact. Also, soil could adhere to workers clothing and off-site migration of lead could occur thus exposing the families of people who work in the area to elevated lead levels.

(4). Food Chain

The extent of fish and wildlife contamination in the area has not been characterized. There is a potential that fish and wildlife in the area are contaminated. Fish are found in Content Brook, which drains Richardson Pond. Rice has been planted in Richardson Pond as a food source for the waterfowl in the area. There is a potential for human exposure to contaminants concentrated in the food chain by eating contaminated wildlife in the area. Hunting of both game and fowl are noted to take place in the area. Consumption of these potentially contaminated foods may constitute a health threat.

(5). Air

Three separate series of the samplings were conducted at IHP during March and June of 1986. The Remedial Investigation air monitoring done in June of 1986 had no samples which were above the detection limit for asbestos of .01 fibers/cm³. The results from the DEQE air monitoring problem did not reveal toxic substances in the air that would indicate the presence of a health threat. A mobile air monitoring unit was employed during sampling at IHP and detected contaminants at the bottom of a capped vent at the Shaffer Landfill. The instrumentation used in the monitoring did not identify specific compounds but instead the number of carbons in the organic compounds detected and their class (aromatic, aliphatic etc.). Quantitative results were not obtained. Since these compounds were only detected at the bottom of a capped vent, it is unlikely that there is an environmental exposure via ambient air and that they should not constitute a health concern. None of these studies addressed the concern of high asbestos levels prior to capping of the asbestos landfill in 1984. Residents who lived around IHP prior to capping of the landfill may have been exposed to wind-generated asbestos from the site. The potential then exists for increased development of asbestos-induced lung disease in those individuals.

The concern for asbestos exposure of residents living near the site years ago may be warranted. Preliminary studies were done by the Division of Environmental Epidemiology and Toxicology at the Massachusetts Department of Public Health. These studies showed a sixfold increase in the lung cancer mortality rate for men aged 18-65 who lived within a one mile radius of the site compared to those who lived outside this radius. The lung cancer mortality rate of women over 65 years of age who lived within a one mile radius of IHP was 3.4 times higher than that for women who lived outside this radius.

VII. CONCLUSIONS AND RECOMMENDATIONS

Based on the information reviewed, ATSDR has concluded that this site is of public health concern because of the risk to human health resulting from the indicated exposure to hazardous substances at concentrations that may result in adverse health effects. As noted in

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cc: R. Christian D. McElroy

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REGIONI

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

The United States Environmental Protection Agency announces Technical Assistance Grants Program

The U.S. Environmental Protection Agency (EPA) in Region I has received a letter of intent to apply for a technical assistance grant at the Iron Horse Park Superfund site from the Superfund Action Committee. By law, only one grant for up to \$50,000 may be awarded to a citizens' group at any one site on the National Priorities List. Because of this limitation and in order to ensure that all community views are represented in recipient groups, EPA encourages all citizens' groups interested in applying for a technical assistance grant at the Iron Horse Park site to consolidate with the Superfund Action Committee and file a joint application. Within 30 days from the date of this notice, groups that wish to join with the Superfund Action Committee for the purposes of this grant application must notify:

Joanne Giovino 10 Eastview Avenue Billerica, MA 01821

Groups wishing to file a separate grant application must, within the next 30 days, submit to EPA a letter of intent to file an application.

All applications must be filed within 60 days of today's date. Groups that require additional time to draft a letter of intent or to file an application may submit a written request for an extension to EPA for consideration. Additional information may be obtained from Ms. Mary H. Grealish, EPA Region I Technical Assistance Grants Project Officer. Letters of intent to apply for a technical assistance grant for the Iron Horse Park site, as well as grant applications, should be sent to:

Ms. Mary H. Grealish, HDA - CAN 4
Technical Assistance Grants Project Officer
U.S. Environmental Protection Agency, Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203
Phone: (617) 573-5701